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6 Attorneys for Plaintiffs BUILD GROUP,
 7 INC. and PACIFIC STRUCTURES, INC.

8
 9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**

13 BUILD GROUP, INC. and PACIFIC
 14 STRUCTURES, INC.,

14 Plaintiffs,

15 v.

16 NATIONAL UNION FIRE
 17 INSURANCE COMPANY OF
 18 PITTSBURGH, PA; GREENWICH
 19 INSURANCE COMPANY; and
 NAVIGATORS SPECIALTY
 INSURANCE COMPANY,

20 Defendants.

CASE NO. 3:18-cv-00331-EMC

**STIPULATED REQUEST TO
 CONTINUE DATES AND
 [PROPOSED] ORDER
 [Local Rule 6-2]**

22 Plaintiffs BUILD GROUP, INC. and PACIFIC STRUCTURES (collectively,
 23 "Plaintiffs") and Defendants NATIONAL UNION FIRE INSURANCE COMPANY
 24 OF PITTSBURGH, PA; GREENWICH INSURANCE COMPANY; and
 25 NAVIGATORS SPECIALTY INSURANCE COMPANY (collectively,
 26 "Defendants"), by and through their respective attorneys of record, hereby submit
 27 this stipulated request for a continuance of case management dates, as stated below:

28 WHEREAS, Plaintiffs filed this action on January 16, 2018;

1 WHEREAS, this insurance coverage dispute concerns Defendants' alleged
2 duty to indemnify Plaintiffs and reach a settlement in connection with various
3 underlying actions filed against Plaintiffs and coordinated in California Superior
4 Court, San Francisco County ("Underlying Claims");

5 WHEREAS, the Court issued an Order Setting Initial Case Management
6 Conference and ADR Deadlines on January 18, 2018, which set the following
7 schedule for this action:

8 Last day to: 9 • meet and confer re: initial disclosures, early settlement, 10 ADR process selection, and discovery plan 11 • file ADR Certification signed by Parties and Counsel 12 • file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference	March 29, 2018
13 Last day to file Rule 26(f) Report, complete initial disclosures 14 or state objection in Rule 26(f) Report and file Case 15 Management Statement per Standing Order re Contents of Joint Case Management Statement	April 12, 2018
16 Initial Case Management Conference	April 19, 2018 at 9:30 AM

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18 WHEREAS, Defendant NAVIGATORS SPECIALTY INSURANCE
19 COMPANY filed its Answer on February 12, 2018;

20 WHEREAS, Plaintiffs and Defendant GREENWICH INSURANCE
21 COMPANY stipulated to extend the time for Defendant GREENWICH
22 INSURANCE COMPANY to file its Answer to April 6, 2018;

23 WHEREAS, Plaintiffs and Defendant NATIONAL UNION FIRE
24 INSURANCE COMPANY OF PITTSBURGH, PA stipulated to extend the time for
25 Defendant NATIONAL UNION FIRE INSURANCE COMPANY OF
26 PITTSBURGH, PA to file its Answer to April 6, 2018;

27 WHEREAS, Plaintiffs and Defendants (collectively, "Parties") and the
28 litigants in the Underlying Claims recently reached a settlement in principle

1 (“Proposed Settlement”), but need additional time to negotiate and confirm final
2 terms and execute a final written agreement;

3 THEREFORE, the Parties request a continuance of certain dates to allow
4 sufficient time for the finalization of the Proposed Settlement so that the Court and
5 the Parties can conserve resources in the meantime, and the Parties specifically
6 request that the Court:

7 1. Extend the deadline for Defendant GREENWICH INSURANCE
8 COMPANY and Defendant NATIONAL UNION FIRE INSURANCE COMPANY
9 OF PITTSBURGH, PA to file their respective Answers to and including April 30,
10 2018 and,

11 2. Continue the dates in the Court’s Order Setting Initial Case
12 Management Conference and ADR Deadlines by approximately 40 days, as follows:

<u>Event</u>	<u>Dates From Court’s Order</u>	<u>Proposed New Dates</u>
Last day to: <ul style="list-style-type: none">• meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan• file ADR Certification signed by Parties and Counsel• file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference	March 29, 2018	May 10, 2018
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement	April 12, 2018	May 24, 2018
Initial Case Management Conference	April 19, 2018 at 9:30 AM	May 31, 2018

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IT IS SO STIPULATED.

DATED: March 23, 2018

HANSON BRIDGETT LLP

Bv: /s/ Candice P. Shih
MILES C. HOLDEN
CANDICE P. SHIH
Attorneys for Plaintiffs BUILD GROUP,
INC. and PACIFIC STRUCTURES, INC.

DATED: March 23, 2018

WOLKIN CURRAN. LLP

Bv: /s/ David F. Myers
BRANDT L. WOLKIN
DAVID F. MYERS
Attorneys for Defendant NAVIGATORS
SPECIALTY INSURANCE COMPANY

DATED: March 23, 2018

DUANE MORRIS LLP

Bv: /s/ Jessica E. La Londe
MAX H. STERN
JESSICA E. LA LONDE
Attorneys for Defendant GREENWICH
INSURANCE COMPANY

DATED: March 23, 2018

SACRO & WALKER LLP

Bv: /s/ Richard D. Bremer
JENNIFER YU SACRO
RICHARD D. BREMER
Attorneys for Defendant NATIONAL
UNION FIRE INSURANCE COMPANY
OF PITTSBURGH, PA

1 **PURSUANT TO STIPULATION, IT IS ORDERED that:**

2 The Court hereby extends the deadline for Defendant GREENWICH
3 INSURANCE COMPANY and Defendant NATIONAL UNION FIRE
4 INSURANCE COMPANY OF PITTSBURGH, PA to file their respective Answers
5 to and including April 30, 2018; and

6 The Court further hereby vacates the dates set in the Court's Order Setting
7 Initial Case Management Conference, and the Court sets the following dates for this
8 action:

<u>Event</u>	<u>New Date</u>
Last day to: <ul style="list-style-type: none">• meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan• file ADR Certification signed by Parties and Counsel• file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference	May 10, 2018
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement	May 24, 2018
Initial Case Management Conference	May 31, 2018

19 **IT IS SO ORDERED.**

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21 DATED: 3/27/18

